

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JAY SRINIVASAN,)	
Plaintiff,)	
)	
v.)	Civil Action
)	No.: 05-10900-GAO
SIEMENS BUSINESS SERVICES,)	
INC.,)	
Defendant.)	

JOINT MOTION TO ENLARGE DISCOVERY DEADLINE

The parties move to enlarge the discovery deadline on the following grounds:

1. Fact discovery is currently scheduled to be completed by March 24, 2006.
2. The plaintiff intends to take the depositions of several additional witnesses.
3. This is the first discovery extension being sought by the parties.
4. The parties are proceeding diligently to complete discovery and need the additional time to complete the fact discovery phase of this case.
5. The parties jointly request that the court extend the fact discovery phase of the case to June 23, 2006.

Respectfully submitted,

JAY SRINIVASAN

By his attorneys,

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/s/ Robert H. Flynn

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